

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS	)	
OF NORTHERN ILLINOIS WELFARE AND	)	
PENSION FUNDS,	)	
	)	
Plaintiffs,	)	
	)	Case No.: 2011 C 841
v.	)	
	)	Judge Gettleman
	)	
JESUS QUINTANILLA, Individually and d/b/a	)	Magistrate Judge Gilbert
E. C. TRUCKING & HAULING CO.	)	
	)	
Defendant.	)	

**MOTION FOR JUDGMENT IN SUM CERTAIN**

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on February 7, 2011 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service was made upon JESUS QUINTANILLA, Individually and d/b/a E. C. TRUCKING & HAULING CO. on March 24, 2011 and a copy of the proof of service was filed with the court on April 4, 2011.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$2,793.20 Pension
\$6,262.10 Welfare
\$925.00 Attorneys fees
<u>\$431.00</u> Court costs
\$9,486.30

WHEREFORE, Plaintiff prays for:

1. Entry of judgment against Defendant, JESUS QUINTANILLA,  
Individually and d/b/a E. C. TRUCKING & HAULING CO., and in favor of Plaintiffs,  
TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS  
WELFARE AND PENSION FUNDS in the amount of \$9,486.30.

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS WELFARE AND  
PENSION FUNDS

s/John J. Toomey  
ARNOLD AND KADJAN  
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Dated: June 13, 2011